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ATTORNEYS FOR KELLAND PROPERTIES, INC.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:

WILLIAM TODD PETERSON,

DEBTOR.

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§

CASE NO. 12-70031-hdh-13
CHAPTER 13

MOTION TO APPROVE ADMINISTRATIVE CLAIM

RESPONSE REQUIRED

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT U.S. COURTHOUSE, 10TH & LAMAR, WICHITA FALLS, TEXAS 76301 BEFORE CLOSE OF BUSINESS ON JUNE 1, 2012 WHICH IS AT LEAST TWENTY-FOUR (24) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

Kelland Properties, Inc. ("Kelland") files this its motion to approve administrative claim and would show the Court the following:

1

At the time of the filing of this bankruptcy, the Debtor was a tenant of Kelland pursuant to a written lease agreement. Debtor continued to use the leased premises after the filing of the bankruptcy, but failed and refused to pay any rental for the use of the leased premises.

2

Pursuant to 11 U.S. C. §503(b)(1)(a) and 11 U.S.C. §507(a), Kelland is entitled to payment of a priority administrative claim for the use of the leased premises after the bankruptcy for the benefit of the Debtor. The amount of the administrative claim is \$1,665.00, which is the monthly rental as set forth in the lease. *In Re Imperial Beverage Group*, 457 B.R. 490 (N.D. Tex. 2011).

WHEREFORE PREMISES CONSIDERED, Kelland prays that the Court approve its administrative claim in the amount of \$1,665.00 and order that the administrative claim be paid in full through the Debtor's Chapter 13 Plan.

Dated: May 8, 2012

Respectfully submitted,

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By: /s/ Hank Rugeley
Hank Rugeley
State Bar No. 17382900

ATTORNEYS FOR KELLAND PROPERTIES,
INC.

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2012, a true and correct copy of the foregoing was served on all parties of record via ECF or first class mail as follows:

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Parties on Attached Matrix

/s/ Hank Rugeley
Hank Rugeley

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